



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JUN 05 2000

Mr. Thomas Huynh
City of Philadelphia
Department of Public Health
Air Management Services
321 University Avenue
Philadelphia, PA 19104-4543

Re: Comments on Proposed Title V Operating Permits for Temple University Main Campus
and Temple University Health Sciences Campus

Dear Mr. Huynh:

Thank you for the opportunity to provide comments on the proposed Title V operating permits referenced above. The enclosure to this letter provides the U.S. Environmental Protection Agency's comments on specific permit terms.

These permits contain issues which we would find objectionable in a final permit. We are committed to working with you to resolve these issues. Please do not hesitate to contact me at (215) 814-2308 to further discuss any of these comments prior to final permit issuance

Sincerely,

A handwritten signature in cursive script, reading "Marilyn Poyers", is written over the typed name.

Marilyn Poyers, Engineer
Permits and Technical Assessment Branch

Enclosure

**EPA comments on Proposed Title V permit for Temple University Main Campus
Permt No. V95-025**

1. Page 29, Condition 1 - There is no periodic monitoring to assure compliance with the particulate and CO emission limits for Groups 1, 2 and 3 combustion units. If it can be shown that the limits can never be exceeded, please include a technical justification (calculations) in the review memo to address this. If, for the natural gas-fired units, the quality of fuel is relied upon to assure compliance with the limit, then the permit must have a condition which allows only natural gas to be used, with associated recordkeeping.
2. Page 31, Condition 4(a)(2) - Since #6 fuel oil will have some visible emissions during normal operating conditions, an initial/baseline Method 9 test must be performed to establish whether the visible emissions are within the VE limits in the permit. Thereafter, the daily monitoring established by the permit would be adequate.
3. Page 31, Condition 4(b) - Many of these small boilers can use #2 fuel. Is this fuel used for backup for natural gas only? If so, then a condition which allows #2 fuel to be used only for such a purpose would be required to be included in the permit. Otherwise, some periodic monitoring for visible emissions would be required.
4. Page 32, Condition 4(c) - Does the 500 hour operational limit assure compliance with the NOx limits? If so, please address this in the review memo.
5. Page 32, Condition 5(a)(1) and (2) - Please include the frequency for the recordkeeping required by this condition.